	R DAVIDSON COUNTY, TENNESSEE ASHVILLE
YARED BEYENE, TADELU KIDANU,) 24/9/2 12°
HAILEMARIAM GEBREMARIAM,	
JEA HUN LEE, ZEWDU GIRMA,	
KIM SENGSAVANG, and RABEEA) 06-1202- W 9H
AL-ALWADI) CASE NO:
Plaintiffs))
) JURY DEMANDED
v.	
COVERALL OF NORTH AMERICA,	<i>)</i>
INC., PACIFIC COMMERCIAL)
SERVICES, LLC, COVERALL)
CLEANING CONCEPTS, and)
COVERALL OF NASHVILLE, INC.)
)
Defendant)
COM	IP)LAINT

This is a civil complaint for damages arising from the willful, fraudulent, and deceptive trade practices of Defendants Coverall North America, Inc., Pacific Commercial Services, LLC, Coverall Cleaning Concepts, and/or Coverall of Nashville, Inc., and agents and/or employees of each, in violation of the Tennessee Consumer Protection Act, fraud in the inducement, negligent misrepresentation, breach of contract, and other statutory and common law violations.

PARTIES

1. Plaintiff Yared Beyene is a resident of the State of Tennessee, residing at 3541

Mt. View Ridge Drive, Antioch, Tennessee 37013.

- 2. Plaintiff Tadelu Kidanu (Mr. Kidanu) is a resident of the State of Tennessee, residing at 4675 Old Lebanon Dirt Road, C-39, Mt. Juliet, Tennessee 37122.
- 3. Plaintiff Hailemariam Gebremariam (Ms. Gebremariam) is a resident of the State of Tennessee, residing at 4675 Old Lebanon Dirt Road, C-39, Mt. Juliet, Tennessee 37122.
- 4. Plaintiff Jea Hun Lee (Mr. Lee) is a resident of the State of Tennessee, residing at 207 Yorktown Road, Clarksville, Tennessee 37042.
- 5. Plaintiff Zewdu Girma (Mr. Girma) is a resident of the State of Tennessee, residing at 305 Millwood Drive. Apt. 475, Nashville, Tennessee 37217.
- 6. Plaintiff Kim Sengsavang (Ms. Sengsavang) is a resident of the State of Tennessee, residing at 6329 Plainview Road, Christiana, TN 37037.
- 7. Plaintiff Rabeea Al-Awadi (Mr. Al-Awadi) is a resident of the State of Tennessee residing at 6620 Forrest Lane, Murfreesboro, TN 37129
- 8. Defendant Coverall North America, Inc. (Coverall) is a business entity authorized to do business in the State of Tennessee and having a principal office located at 500 W. Cypress Creek, Suite 580, Ft. Lauderdale, Florida 33309. Defendant may be served with process through its registered agent, Corporate Creations Network, Inc. at 205 Powell Place, Brentwood, Tennessee 37027. Coverall North America, Inc. does business in Tennessee under the assumed name of Coverall Cleaning Concepts.

- 9. Defendant Pacific Cleaning Services, LLC (PCS) is a Texas corporation, not licensed to do business in the State of Tennessee. PCS's registered agent of service is David Wood, 14901 Quorum Drive, Suite 85, Dallas, TX 75240.
- 10. Defendant Coverall Cleaning Concepts, Inc., is an assumed name for Coverall of North America, Inc., and an entity under which "franchise" opportunities were offered and sold in the State of Tennessee. Coverall Cleaning Concepts is not licensed to do business in the State of Tennessee.
- 11. Defendant Coverall of Nashville, Inc. is a business entity authorized to do business in the State of Tennessee and having a principal office located at 1511 A Rosedale Avenue, Nashville, Tennessee 37207. Defendant Coverall of Nashville, Inc. may be served with process through its registered agent "Coverall of Nashville, Inc." located at 311 Plus Park Boulevard, Nashville, Tennessee 37217.

FACTS

- 12. Each Plaintiff is a legal immigrant to the United States, but each is illiterate in reading and writing the English language.
- 13. Defendants engage, at least in part, in commercial cleaning services and the purported "franchising" of commercial cleaning service businesses.

- 14. Defendants' employees induced Plaintiffs into executing so-called franchise agreements in which the business relationship was actually general contractor -subcontractor or employer-employee.
- 15. At the time each Plaintiff signed his/her franchise agreement and subsequent promissory note and/or notes, each paid Defendants for the privilege.
- 16. None of the Plaintiffs were capable of entering into a contract due to their respective deficiencies in reading and writing the English language.
- 17. Defendants engaged in the deceptive practice of inducing Plaintiffs into signing so-called franchise agreements, and promissory notes without the present intention of performing their obligations under those agreements.
- 18. Defendants failed to properly train Plaintiffs for the specific job functions pertaining to each customer account.
- 19. Defendants' actions constituted a pattern or practice of placing Plaintiffs into a cleaning account, and then when a customer complaint occurred, failing to investigate the complaint at the customer's location, or in many cases failing to notify the Plaintiffs of the Complaint. The result of this pattern or practice is that the Plaintiffs would lose the account within a short period of time.
- 20. Defendants intentionally failed to instruct the Plaintiffs as to remedying the specific complaint, or failed to notify the Plaintiffs of the complaint itself, in order to take the customer account from the Plaintiffs and give it to a "new"

- franchisee, who recently paid money to Defendants for these so-called franchises.
- 21. Defendants promised Plaintiffs new accounts immediately upon entering into these so-called franchise agreements; however, Defendants failed to place Plaintiffs into these accounts according to the scheduled payments made by the Plaintiffs. Because of this action, Defendants are liable in damages for the following violations.
- 22. Each Plaintiff was subjected to the "shuffling" arrangement, and each has been promised a new account without delivery. Defendants had no present intention of placing Plaintiffs into subsequent accounts, beyond this initial shuffling.

CAUSES OF ACTION

VIOLATIONS OF THE TENNESSEE CONSUMER PROTECTION ACT

- 23. Defendants are liable, in damages, for the following violations of the Tennessee

 Consumer Protection Act, which statutes were in full force and effect at all
 times material to Plaintiffs' Complaint:
 - a. Tenn. Code Ann. § 47-18-104(b)(3); Causing likelihood of confusion or misunderstanding as to affiliation, connection or association with, or certification by, another;

- b. Tenn. Code Ann. § 47-18-104(b)(5); Representing that goods and services have sponsorship approval, characteristics, ingredients, uses, benefits or quantities that they do not have or that a person has a sponsorship approval, status, affiliation, or connection that such person does not have;
- c. Tenn. Code Ann. § 47-18-104(b)(9); Advertising services with intent not to sell them as advertised;
- d. Tenn. Code Ann. § 47-18-104(b)(12); Representing that a consumer transaction confers or involves rights, remedies, or obligations that it does not have or involve or which are prohibited by law;
- e. Tenn. Code Ann/ § 47-18-(b)(2); Causing likelihood of confusion or of misunderstanding as to the source, sponsorship, approval or certification of goods and services. This subdivision does not prohibit the private labeling of goods and services;
- f. Tenn. Code Ann. § 47-18-104(b)(27); Engaging in any other act or practice which is deceptive to the consumer or to any other person.
- 24. Plaintiffs, due to their respective inability to read and write the English language, lacked the competence to appreciate the consequences of their unfair bargaining position and therefore are entitled to recission from each and every purported contract they executed with Defendants, including but not limited to their franchise agreements and each and every promissory note.

- 25. The nature of the deception or coercion practiced upon Plaintiffs was of the most egregious kind, involving the signing of promissory notes and false franchise agreements in an effort to bind Plaintiffs to obligations and amounts of which they were unaware and/or could not appreciate.
- 26. By their deceptive acts, Defendants, through their agents and/or employees, did not act in good faith and willfully and/or knowingly violated the provisions of the Tennessee Consumer Protection Act.
- 27. Defendants are liable to Plaintiffs in damages arising from Defendants violations of the Tennessee Consumer Protection Act, and these damages should be trebled due to Defendant's willful violations of said Act, pursuant to Tenn. Code Ann. § 47-18-109(a)(3).

FRAUD IN THE INDUCEMENT

- 28. Defendants, through their agents and/or employees, intentionally misrepresented material facts pertaining to the scope of Plaintiffs' employment status with Defendants.
- 29. At the time these representations were made, Defendants' agents and/or employees had knowledge of the falsity of these representations.
- 30. Plaintiffs, to the extent each could understand the English language, reasonably relied upon these false representations and were consequently injured as a result of this reliance.

31. When these false representations were made, Defendants' agents and/or employees had no present intent to fully perform their promises to Plaintiffs.

NEGLIGENT MISREPRESENTATION

- 32. Defendants, in the course of their business, failed to exercise reasonable care or competence in communicating material information to Plaintiffs pertaining to their respective statuses as a franchisee of Defendant Coverall. Defendants, through their agents and/or employees, supplied false information for the guidance of Plaintiffs in their business transactions with Defendants. As such, Defendants are subject to liability for the pecuniary loss caused to Plaintiffs by their justifiable reliance upon the information.
- 33. Defendants' agents and/or employees intentionally or negligently supplied false information and/or omitted necessary material facts and information to Plaintiffs in the guiding of their business transactions with Defendants.

 Plaintiffs reasonably relied upon this false information to their detriment.
- 34. Defendants are liable in damages to Plaintiffs for the intentional and/or negligent misrepresentations made by its agents and/or employees.
- 35. Defendants are liable in damages to Plaintiffs for fraud in the inducement. WHEREFORE, PREMISES CONSIDERED, Plaintiffs demand:
 - 1. That process be issued and served upon all Defendants, and each and every

 Defendant be required to appear and Answer Plaintiffs' Complaint;

- 2. That Plaintiffs be awarded a collective judgment against Defendants in the amount of \$200,000.00 in damages;
- 3. That Plaintiffs be awarded treble damages for Defendants' willful violations of the Tennessee Consumer Protection Act;
- 4. That Plaintiffs be awarded punitive damages;
- That Plaintiffs be awarded reasonable attorneys' fees and associated costs, including discretionary costs;
- 6. That Plaintiffs be awarded recission of each and every contractual obligation allegedly entered into between them and Defendants;
- 7. Prejudgment and post-judgment interest;
- 8. Such further and other general relief to which Plaintiffs may be entitled under the laws of the State of Tennessee; and
- 9. A jury to try all issues so triable of right.

Respectfully submitted:

BLACKBURN & MCCUNE, PLLC

Jay R. Slobey (#5398)

Patrick Dollar (#23602)

SunTrust Bank Building

Suite 1700

201 Fourth Avenue, North

Nashville, Tennessee 37219

Attorneys for Plaintiffs

Inc.

		MAY 3 0 2006
STATE OF TENNESSEE 20TH JUDICIAL DISTRICT		CASE FIDEV NUMBER TO COL
CHANCERY COURT	SUMMONS	OCAL PIDEV NUMBER I CELL COL
PLAINTIFF Yared Bevene, Tadely Kidon		00-1202
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Lewdu Girma, Kim Sengsavang, and	racitic commer	Clai Services IIV C 11
Rabeea Al-Awadi	Cleaning Conce	ots, and Coverall of Nashville,
TO: (NAME AND ADDRESS OF DEFENDANT)		·
Coverall of Nashville, Inc.		
311 Park Plus Boulevard, Suite 140	· 	14.11
Nashville, TN 37217		Method of Service:
		☐ Certified Mail ☐ Davidson Co. Sheriff
We a should		Davidson Co. Sheriff
Bully Wordly		*Secretary of State
		*Out of County Sheriff
		Private Process Server
List each defendant on a separate summe	One	□ Other
2 state of the contract of the	ons.	*Attach Required Fees
YOU ARE SUMMONED TO DEFEND A CIVIL ACTION	LETTED ACATHOT VOLUME	
YOU ARE SUMMONED TO DEFEND A CIVIL ACTION TENNESSEE, YOUR DEFENSE MUST BE MADE IN	FILED AGAINST YOU IN C	HANCERY COURT, DAVIDSON COUNTY,
MADE WI	THIN THIRTY (30) DAYS	FROM THE DATE THE CHARLES
SERVED UPON YOU. YOU MUST FILE YOUR DEFEI	NSE WITH THE CLERK OF T	HE COURT AND CEND & CONV.
PLAINTIFF'S ATTORNEY AT THE ADDRESS LISTED	PELOW TE VOIL FATE TO	THE COOK! AND SEND A COPY TO THE
DATE, JUDGMENT BY DEFAULT CAN BE DEVICED	DELOW. IF YOU FAIL TO	DEFEND THIS ACTION BY THE ABOVE
DATE, JUDGMENT BY DEFAULT CAN BE RENDERED	AGAINST YOU FOR THE REI	IEF SOUGHT IN THE COMPLAINT.
Attorney for plaintiff or plaintiff if filing Pro Se:		
(Name, address & telephone number)	FILED, ISSUED & ATTESTED	
Jay R. Slobey, Esq. (#5398)		
Patrick Dollar, Esq. (#23602)		5-16-06
201 Fourth Avenue North, Suite 1700	CRISTI SCOTT, Clerk and Ma	aster
Nashville, TN 32719	By: 50	1 Great Circle Road
615-254-7770		cond Floor shville, TN 37228
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NOTICE (OF DISPOSITION DATE	Clerk & Master
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by this date or it will be dismissed by the Court for fa	mure to prosecute pursuant	to T.R.C.P. 41.02 and Local Rule 18.
If you think the case will require more than or Clerk and Master at the earliest practicable date asking easons. Extensions will be granted only when except	ag for an extension of the	trial, you must send a letter to the
reasons. Extensions will be granted only when excep	ational significants and a	sposition date and stating your
	donai circumstances exist.	: 1
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	The state of the s	
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	Sheriff	
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***Submit one original plus one copy for each defendant to be served.

RETURN ON SERVIC	E OF SUMMONS
I hereby return this summons as follows: (Name of Party Served)	Covern of NASHVILLE
Served RY HANA DELIVEY	□ Not Found
DATE OF RETURN: By	y: Jamie Brodles
<u>5-26-06</u> s	heritt/or other authorized person to serve process
RETURN ON SERVICE O	F SUMMONS BY MAIL
I hereby certify and return that on the day of	, 20, I sent, postage prepaid, by registered return
receipt mail or certified return receipt mail, a certified copy of the summ	ons and a copy of the complaint in case
to the defendant, on the day o	f, 20 I received the
return receipt, which had been signed by	
20 The return receipt is attached to this original summons to be file	
Sworn to and subscribed before me on this day of	
My Commission Expires:	
NOTICE OF PERSONAL	
PROPERTY EXEMPTION	·
To THE DEFENDANT(S): Tennessee law provides a four thousand dollar (\$4,000.00) debtor's equity interest personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt; you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Mail list to: Clerk & Master #2 Metro Courthouse	ATTACH RETURN RECEIPT HERE (IF APPLICABLE)
Nashville TN 37201	·
Please state file number on list.	
CERTIFICATION (IF	APPLICABLE)
I, Cuisti Scott, Clerk & Master of the Chancery Court in the State of Tennessee, Davidson County, do certify this to be a true and correct copy of the original summons issued in this case.	CRISTI SCOTT, Clerk & Master By:

Inc.

i .			MAY 3 0 20
STATE OF TENNESSEE	<u> </u>		
20TH JUDICIAL DISTRICT	art		CASE FILE NUMBER Chancer
CHANCERY COURT	SUMMONS		06-1202-71
PLAINTIFF Yared Beyene	, Tadelu Kidanu,	DEFENDANT Coverall o	f North America, Inc.,
Hailemariam Gebremariam	, Jea Hun Lee,	Pacific Commercial S	ervices, LLC, Coverall
Zewdu Girma, Kim Sengsa	vang, and	Cleaning Concepts. a	nd Coverall of Nashville
Rabeea Al-Awadi			at coverait of Mashville
TO: (NAME AND ADDRESS	OF DEFENDANT)		
Coverall Cleaning C	oncepts		
Serve: Corporate Cr 205 Powell Place	eations Network, Li		Method of Service:
Brentwood, TN 3702	~	므	Certified Mail
brentwood, in 3702	<i>/</i>		Davidson Co. Sheriff
	1		*Comm. of Insurance
Dm h	//		*Secretary of State
			*Out of County Sheriff Private Process Server
List each doford	•	ā	Other
List each defendant on a	separate summons.		*Attach Required Fees
VOILARE CHAMONED TO			
TOO ARE SUMMONED TO DEFE	ND A CIVIL ACTION FILE	ED AGAINST YOU IN CHANCE	RY COURT, DAVIDSON COUNTY,
TENNESSEE. YOUR DEFENSE N	IUST BE MADE WITHIN	N THIRTY (30) DAYS FROM	THE DATE THIS SUMMONS IS
SERVED UPON YOU. YOU MUS	T FILE YOUR DEFENSE	WITH THE CLERK OF THE CO.	URT AND SEND A COPY TO THE
PLAINTIFF'S ATTORNEY AT THE	C ADDRESS LEGGE	THE CLERK OF THE COL	JRT AND SEND A COPY TO THE
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			THE COM LAIN!
Attorney for plaintiff or plaintiff if fi (Name, address & telephone number)	ing Pro Se: FI	LED, ISSUED & ATTESTED	
Jay R. Slobey, Esq. (#53	98)		
Patrick Dollar, Esq. (#2	3602))	12-06
201 Fourth Avenue North,	Suite 1700 CR	RISTI SCOTT, Clerk and Master	
Nashville, TN 32719	Ву	501 Great	Circle Road
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		Nashville,	IN 37228
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Clerk and Master at the earliest n	racticable date against fa	ear to resolve or set for trial, yo	ou must send a letter to the
			on date and stating your
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		Sheriff	

***Submit one original plus one copy for each defendant to be served.

RETURN ON SERVIC	E OF SUMMONS
I hereby return this summons as follows: (Name of Party Served) DE SO ZAH Served RY HAWA DELWERY TO MARAES Not Served	
□ Not Served	Other
DATE OF RETURN: By	Famire Bradley
1	heriff/or other authorized person to serve process
RETURN ON SERVICE O	F SUMMONS BY MAIL
I hereby certify and return that on the day of	
receipt mail or certified return receipt mail, a certified copy of the summ	
to the defendant, on the day or	
return receipt, which had been signed by	•
20 The return receipt is attached to this original summons to be filed	
Sworn to and subscribed before me on this day of, 20 Signature of Notary Public or Deputy Clerk	Signature of plaintiff, plaintiff's attorney or other person authorized by statute to serve process.
NOTICE OF PERSONAL PROPERTY EXEMPTION TO THE DEFENDANT(S): Tennessee law provides a four thousand dollar (\$4,000.00) debtor's equity interest personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain	ATTACH RETURN RECEIPT
such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.	HERE (IF APPLICABLE)
Mail list to: Clerk & Master #2 Metro Courthouse Nashville TN 37201	
Please state file number on list.	
CERTIFICATION (IF	APPLICABLE)
I, Cristi Scott, Clerk & Master of the Chancery Court in the State of Tennessee, Davidson County, do certify this to be a true and correct copy of the original summons issued in this case.	CRISTI SCOTT, Clerk & Master By: D.C. & M.

STATE OF TENNESSEE	OF TENNEGGER			
20° JUDICIAL DISTRICT CHANCERY COURT	SUMMONS CASE FILE NUMBER		TV	
PLAINTIFF Yared Beyene	, Tadelu Kidanu,	DEFENDANT COVER	all of North America, Inc	
Hailemariam Gebremariam	· Jea Hun Lee	Pacific Commerce	ial Services, LLC, Covera	2.,
Zewdu Girma, Kim Sengsa	vang, and	Cleaning Concent	tal Services, LLC, Covera	111
Rabeea Al-Awadi	· ·	oreaning concept	ts, and Coverall of Nashy	fille,
TO: (NAME AND ADDRESS (OF DEFENDANT)			-
Pacific Commercial S c/o David Wood	ervices, LLC		Wakin di di w	
14901 Quorum Drive,	Suite 855		Method of Service:	
Dallas, TX 75240			☐ Certified Mail☐ Davidson Co. Sher.	
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List each defendant on a			□ Other	21101
and defendant on a	separate summons.		*Attach Required Fe	es
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YOU ARE SUMMONED TO DEFE	AD A CIVIL ACTION FILE	D AGAINST YOU IN CH	ANCERY COURT, DAVIDSON CO	UNTY,
TENNESSEE. YOUR DEFENSE N	MUST BE MADE WITHIN	THIRTY (30) DAYS F	ROM THE DATE THIS SUMMO	NC TO
SERVED UPON YOU. YOU MUS	T FILE YOUR DEFENSE V	ITH THE CLEDY OF TH	IF COURT AND STATE	143 13
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Attorney for plaintiff or plaintiff if fil (Name, address & telephone number)	ing Pro Se: FIL	ED, ISSUED & ATTESTED		
Jay R. Slobey, Esq. (#53	98)		- 4 6 6	.
Patrick Dollar, Esq. (#23602)			5-12-06	,
201 Fourth Avenue North,	Suite 1700 CR	STI SCOTT, Clerk and Mas	ster	
Nashville, TN 32719	By:		. Great Circle Road	
615-254-7770		Second Floor		
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and haster at the willest b	lacticative trace assign for	an avtanción of the die	sposition date and stating your	
easons. Extensions will be grant	ed only when exceptiona	l circumstances exist.	J .	
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		DATE VECETAED		
				-
		CL - icc		
	·	Sheriff		

Inc.

^{***}Submit one original plus one copy for each defendant to be served.

RETURN ON SERVIC	E OF SUMMONS
I hereby return this summons as follows: (Name of Party Served)	Selvetary of State
Served DO	Other Other
DATE OF RETURN: $O - \lambda - OO$ S	theriff/or other authorized person to serve process (1)
RETURN ON SERVICE O	F SUMMONS BY MAIL
I hereby certify and return that on the day of receipt mail or certified return receipt mail, a certified copy of the summ	
to the defendant, on the day or	f, 20 I received the
return receipt, which had been signed by	on the day of,
20 The return receipt is attached to this original summons to be file	d by the Chancery Court Clerk & Master.
Sworn to and subscribed before me on this day of, 20 Signature of Notary Public or Deputy Clerk	Signature of plaintiff, plaintiff's attorney or other person authorized by statute to serve process.
NOTICE OF PERSONAL PROPERTY EXEMPTION TO THE DEFENDANT(S): Tennessee law provides a four thousand dollar (\$4,000.00) debtor's equity interest personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Mail list to: Clerk & Master #2 Metro Courthouse Nashville TN 37201	ATTACH RETURN RECEIPT HERE (IF APPLICABLE)
Please state file number on list.	
CERTIFICATION (IF	APPLICABLE)
I, Cristi Scott, Clerk & Master of the Chancery Court in the State of Tennessee, Davidson County, do certify this to be a true and correct copy of the original summons issued in this case.	CRISTI SCOTT, Clerk & Master By:

STATE OF TENNESSEE		MAY 3 0 2006
20 TH JUDICIAL DISTRICT CHANCERY COURT	SU	MMONS CASE FILE NUMBER Day. Co. Chargery Co.
PLAINTIFF Yared Beyene	, Tadelu Kidanu,	DEFENDANT Coverall of North America, Inc.,
Hailemariam Gebremariam	, Jea Hun Lee,	Pacific Commercial Services, LLC. Coveral1
Zewdu Girma, Kim Sengsav	vang, and	Cleaning Concepts, and Coverall of Nashville, I
Rabeea Al-Awadi		The state of Mashiville, I
TO: (NAME AND ADDRESS (Coverall of North Amer Serve: Corporate Creat	cica, Inc.	
205 Powell Place	LOND NECWOIN, THE.	Method of Service:
Brentwood, TN 37027		Certified Mail
_		Davidson Co. Sheriff
	A	
$\rightarrow M$	a-du-	Out of County Sheriff
1	adu Office M separate summons	Private Process Server
List each defendant on a	Office M	avacer Other
each defendant on a	separate summons!	*Attach Required Fees
VOLLARE CUMMACOURS		
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TENNESSEE. YOUR DEFENSE M	1UST BE MADE WITHII	N THIRTY (30) DAYS FROM THE DATE THIS SUMMONS IS
SERVED UPON YOU YOU MUS	T FTI E VOUD DEEDNOR	WITH THE CLERK OF THE DATE INIS SUMMONS IS
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PLAINTIFF'S ATTORNEY AT THE	E ADDRESS LISTED BEL	OW. IF YOU FAIL TO DEFEND THIS ACTION BY THE ABOVE
DATE, JUDGMENT BY DEFAULT (CAN BE RENDERED AGAI	INST YOU FOR THE RELIEF SOUGHT IN THE COMPLAINT.
Attorney for plaintiff or plaintiff if fil (Name, address & telephone number)	į i	ILED, ISSUED & ATTESTED
Jay R. Slobey, Esq. (#5398) Patrick Dollar, Esq. (#23602)		5-12-06
201 Fourth Avenue North,	Suite 1700 CF	RISTI SCOTT, Clerk and Master
Nashville, TN 32719	Ву	7: 501 Great Circle Road Second Floor
615-254-7770		Nashville, TN 37228
		\(\sigma \)
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	NOTICE OF D	Deputy Clerk & Master VISPOSITION DATE
	TOTICE OF D	IN COLLION DATE
The disposition date of things this date or it will be dismissed	s case is twelve months d by the Court for failure	from date of filing. The case must be resolved or set for trial to prosecute pursuant to T.R.C.P. 41.02 and Local Rule 18.
If you think the case will r Clerk and Master at the earliest p reasons. Extensions will be grant	ilacucable date askind to	ear to resolve or set for trial, you must send a letter to the or an extension of the disposition date and stating your
	only when exception	ar Greathstatices exist,
TO THE SHERIFF:		DATE RECEIVED
		The same of the first of the first
		Charles
		Sheriff

***Submit one original plus one copy for each defendant to be served.

RETURN ON SERVICE	E OF SUMMONS
I hereby return this summons as follows: (Name of Party Served)	
Served <u>REGISTELE BACENT CORPORATE (REATTONS NET</u> D Not Served	Other
	Randy Mc Clarakan
5-26-06	heriff/or other authorized person to serve process
RETURN ON SERVICE O	F SUMMONS BY MAIL
I hereby certify and return that on the day of	
receipt mail or certified return receipt mail, a certified copy of the summ	
to the defendant, on the day of	, 20 I received the
return receipt, which had been signed by	on the day of,
20 The return receipt is attached to this original summons to be filed	by the Chancery Court Clerk & Master.
Sworn to and subscribed before me on this day of, 20	Signature of plaintiff, plaintiff's attorney or other person authorized by statute to serve process.
Signature of Notary Public or Deputy Clerk	Randy Mc Clanahan
My Commission Expires:	· ·
NOTICE OF PERSONAL	
PROPERTY EXEMPTION	
TO THE DEFENDANT(S):	
Tennessee law provides a four thousand dollar (\$4,000.00) debtor's equity interest personal property exemption from execution or	
seizure to satisfy a judgment. If a judgment should be entered against	
you in this action and you wish to claim property as exempt, you must	
file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may	
be changed by you thereafter as necessary; however, unless it is filed	
before the judgment becomes final, it will not be effective as to any	
execution or garnishment issued prior to the filing of the list. Certain	
items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself	ATTACH
and your family and trunks or other receptacles necessary to contain	RETURN
such apparel, family portraits, the family Bible, and school books.	RECEIPT
Should any of these items be seized you would have the right to	HERE
recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.	(IF APPLICABLE)
Mail list to: Clerk & Master	
#2 Metro Courthouse	
Nashville TN 37201	
Please state file number on list.	
CERTIFICATION (IF	APPLICABLE)
I, Cristi Scott, Clerk & Master of the Chancery Court in the State of	CRISTI SCOTT, Clerk & Master
Tennessee, Davidson County, do certify this to be a true and correct	D.
copy of the original summons issued in this case.	By:
	D.C. & M.